

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GRAHAM CHASE ROBINSON

Plaintiff,

v.

**ROBERT DE NIRO and
CANAL PRODUCTIONS, INC.,**

Defendants.

Case No. 1:19-cv-09156-LJL-KHP

**NOTICE OF PLAINTIFF'S MOTION TO CERTIFY THE COURT'S
SUMMARY JUDGMENT ORDER FOR INTERLOCUTORY REVIEW
PURSUANT TO 28 U.S.C. § 1292(b)**

PLEASE TAKE NOTICE THAT, upon the pleadings and prior proceedings had herein, Plaintiff Graham Chase Robinson shall move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at such date and time as the Court may direct, for relief amending the Court's Opinion and Order (Dkt. No. 382) to certify one or more questions for interlocutory review pursuant to 28 U.S.C. § 1292(b).

In support of this Motion, Plaintiff submits the Memorandum of Law filed herewith.

Dated: June 15, 2023

Respectfully submitted,

/s/ Melinda Koster

Melinda Koster (MK-1384)

Alexandra Harwin (AH-3111)

David Sanford (5695671)

Jeremy Heisler (JH-0145)

Kate MacMullin (5693882)

SANFORD HEISLER SHARP, LLP

1350 Avenue of the Americas, 31st Floor

New York, New York 10019

Telephone: (646) 402-5650
Facsimile: (646) 402-5651
mkoster@sanfordheisler.com
aharwin@sanfordheisler.com
dsanford@sanfordheisler.com
jheisler@sanfordheisler.com
kmacmullin@sanfordheisler.com

Michael Lockman (5485156)
SANFORD HEISLER SHARP, LLP
611 Commerce Street, Suite 3100
Nashville, Tennessee 37203
Telephone: (615) 434-7000
Facsimile: (615) 434-7020
mlockman@sanfordheisler.com

Counsel for Plaintiff Graham Chase Robinson